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Attorneys for Defendants
7 HANDLER, THAYER & DUGGAN, LLC and
8 THOMAS J. HANDLER, J.D., P.C. (erroneously sued
9 herein as THOMAS J. HANDLER, individually)

10 UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA

12 GREGORY R. RAIFMAN, individually and as)
13 Trustee of the RAIFMAN FAMILY REVOCABLE)
14 TRUST DATED 7/2/03; SUSAN RAIFMAN,)
15 individually and as Trustee of the RAIFMAN)
16 FAMILY REVOCABLE TRUST DATED 7/2/03;)
and GEKKO HOLDINGS, LLC, an Alaskan limited)
liability company, dba GEKKO BREEDING AND)
RACING,)

17 Plaintiffs,)

18 vs.)

19 CLASSICSTAR, LLC, a Utah limited liability)
20 company; CLASSICSTAR FARMS, LLC, a)
21 Kentucky limited liability company; BUFFALO)
22 RANCH, a business entity form unknown;)
23 GEOSTAR CORPORATION, a Delaware)
24 corporation; S. DAVID PLUMMER; SPENCER D.)
25 PLUMMER, III; TONY FERGUSON; THOMAS)
26 ROBINSON/ JOHN PARROT; HANDLER,)
THAYER & DUGGAN, LLC, an Illinois limited)
liability company; THOMAS J. HANDLER;)
KARREN, HENDRIX, STAGG, ALLEN &)
COMPANY, P.C., a Utah professional corporation,)
f/k/a/ KARREN, HENDRIX &)
ASSOCIATES, P.C., a Utah professional)
corporation; TERRY L. GREEN; and DOES)
1-1000, inclusive,)

27 Defendants.)
28

No. C07-2552 MJJ

PROOF OF SERVICE

PROOF OF SERVICE

I, the undersigned, declare that I am over the age of eighteen (18) years and not a party to the within action.

My business address is 1999 Harrison Street, Suite 700, Oakland, California.

On July 23, 2007 I served the within the following documents:

- 1) NOTICE OF MOTION AND MOTION TO SET ASIDE DEFAULT [FRCP 55(c)];
- 2) MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO SET ASIDE DEFAULT [FRCP 55(c)];
- 3) DECLARATION OF JOHN M. DRATH IN SUPPORT OF MOTION TO SET ASIDE DEFAULT [FRCP 55(c)];
- 4) (PROPOSED) ANSWER TO COMPLAINT; DEMAND FOR JURY TRIAL;
- 5) DECLARATION OF SCOTT STAINS IN SUPPORT OF MOTION TO SET ASIDE DEFAULT [FRCP 55(c)];
- 6) DECLARATION OF JAMES DUGGAN IN SUPPORT OF MOTION TO SET ASIDE DEFAULT [FRCP 55(c)];
- 7) DECLARATION OF THOMAS J. HANDLER IN SUPPORT OF MOTION TO SET ASIDE DEFAULT [FRCP 55(c)];
- 8) (PROPOSED) ORDER SETTING ASIDE DEFAULT [FRCP 55(c)]


on all interested parties in said action, addressed as follows.

RICHARD J. IDELL, ESQ.
ORY SANDEL, ESQ.
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Counsel for: PLAINTIFFS GREGORY R. RAIFMAN AND SUSAN RAIFMAN,
INDIVIDUALLY AND AS TRUSTEES FOR THE RAIFMAN FAMILY
REVOCABLE TRUST DATE 7/2/03, and GEKKO HOLDINGS, LLC AN
ALASKA LIMITED LIABILITY COMPANY, dba GEKKO BREEDING AND
RACING

* **HAND:** By placing a true copy thereof in a sealed envelope and causing said envelope to be delivered by hand to the address(s) noted above, during normal business hours.

I declare under penalty of perjury, in accordance with the laws of the State of California, that the foregoing is true and correct. Executed on July 23, 2007, at Oakland, California..



LISA L. BROWN

PROOF OF SERVICE

I, the undersigned, declare that I am over the age of eighteen (18) years and not a party to the within action.

My business address is 1999 Harrison Street, Suite 700, Oakland, California.

On July 23, 2007 I served the within the following documents:

- 1) **NOTICE OF MOTION AND MOTION TO SET ASIDE DEFAULT [FRCP 55©];**
- 2) **MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO SET ASIDE DEFAULT [FRCP 55©];**
- 3) **DECLARATION OF JOHN M. DRATH IN SUPPORT OF MOTION TO SET ASIDE DEFAULT [FRCP 55©];**
- 4) **(PROPOSED) ANSWER TO COMPLAINT; DEMAND FOR JURY TRIAL;**
- 5) **DECLARATION OF SCOTT STAINS IN SUPPORT OF MOTION TO SET ASIDE DEFAULT [FRCP 55©];**
- 6) **DECLARATION OF JAMES DUGGAN IN SUPPORT OF MOTION TO SET ASIDE DEFAULT [FRCP 55©];**
- 7) **DECLARATION OF THOMAS J. HANDLER IN SUPPORT OF MOTION TO SET ASIDE DEFAULT [FRCP 55©];**
- 8) **(PROPOSED) ORDER SETTING ASIDE DEFAULT [FRCP 55(c)]**

on all interested parties in said action, addressed as follows.

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RANCH & SPENCER D PLUMMER, III

*** MAIL:** By placing a true copy thereof in a sealed envelope with postage thereon fully prepaid in the United States Post Office in Oakland, California. I am readily familiar with the firm's practice of collection and processing correspondence/documents for mailing. It is deposited with the United States Postal Service on that same day in the ordinary course of business. I am aware that on motion of the party or parties served that service is presumed invalid if the postal cancellation date or postage meter date is more than one (1) day after the date of depositing for mailing.

I declare under penalty of perjury, in accordance with the laws of the State of California, that the foregoing is true and correct. Executed on July 23, 2007, at Oakland, California..


LISA L. BROWN